

ARIAS OZZELLO & GIGNAC LLP

J. Paul Gignac, State Bar No. 125676  
 Mischa N. Barteau, State Bar No. 274474  
**ARIAS OZZELLO & GIGNAC LLP**  
 115 S. La Cumbre Lane, Suite 300  
 Santa Barbara, California 93105  
 Telephone: (805) 683-7400  
 Facsimile: (805) 683-7401  
 j.paul@aogllp.com  
 mbarteau@aogllp.com

J.A. Ted Baer, State Bar No. 135092  
**LAW OFFICE OF J.A. TED BAER**  
 21 E. Canon Perdido Street, Suite 223  
 Santa Barbara, California 93101  
 Telephone: (805) 963-7177  
 Facsimile: (801) 730-2874  
 ted@tedbaerlaw.com

Attorneys for Plaintiff  
 Kelly Wilson

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

KELLY WILSON, an individual,

Plaintiff,

vs.

THE WALT DISNEY COMPANY, a Delaware corporation; DISNEY ENTERPRISES, INC., a Delaware corporation; WALT DISNEY PICTURES, a California corporation; WALT DISNEY MOTION PICTURES GROUP, INC., a California corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. 3:14-cv-01441-VC

**DECLARATION OF J. PAUL GIGNAC  
 IN SUPPORT OF PLAINTIFF'S  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL EXHIBITS TO  
 DECLARATION OF J.A. TED BAER IN  
 SUPPORT OF PLAINTIFF'S  
 OPPOSITION TO DEFENDANTS'  
 MOTION FOR SUMMARY  
 JUDGMENT**

Judge: Hon. Vince G. Chhabria

Date: April 9, 2015

Time: 10:00 a.m.

Ctrm: 4

**DECLARATION OF J. PAUL GIGNAC**

I, J. Paul Gignac, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I have personal knowledge of the matters stated herein. If called as a witness, I could and would testify truthfully and competently thereto under oath.

2. I have been admitted and licensed to practice before all of the courts of the State of California since 1986. I have at all times since then been a member in good standing of the California State Bar. I have been admitted to and have practiced before the United States District Court for the Northern District of California since 1987.

3. I am a partner with the law firm of Arias Ozzello & Gignac LLP, one of the law firms representing plaintiff Kelly Wilson ("Plaintiff") in this action.

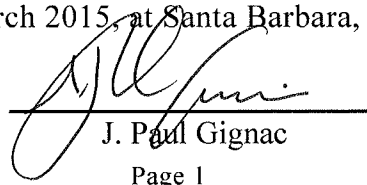
4. I submit this declaration in support of Plaintiff's Administrative Motion to File Under Seal Exhibits to Declaration of J.A. Ted Baer in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment ("Administrative Motion to File Under Seal"), as required by Local Rule 79-5(e).

5. Defendants have designated as either "confidential" or "highly confidential/attorneys' eyes only" the entirety of each of the documents attached as Exhibits 1, 3-12, 17, and 19 to the Declaration of J.A. Ted Baer in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment in this action.

6. The unredacted version of the Memorandum of Points and Authorities in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment and in Further Support of Plaintiff's Motion for Partial Summary Judgment refers to information or documents designated by Defendants as either "confidential" or "highly confidential/attorneys' eyes only."

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of March 2015, at Santa Barbara, California.

  
J. Paul Gignac  
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